

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALLEN ROBINSON,)	
)	
Plaintiff,)	
)	
v.)	Case No. 23-cv-2724
)	
WAYNE FRANO, VINCENT CELIO, CARL)	Judge Martha M. Pacold
BRASIC, TIMOTHY MCDERMOTT, JOHN)	
FOLINO, JR., PATRICK CONROY, DAVID)	Magistrate Judge Heather K. McShain
ZELIG, PETER BABICH, and the CITY OF)	
CHICAGO,)	
)	
Defendants.)	

JOINT STATUS REPORT

Pursuant to this Court's Order (Dkt. 126), the parties submit the following joint status report regarding the progress of discovery and the status of settlement, if any:

Progress of Discovery

1. Since the parties' last status report in this case, the Court granted Defendants' request to extend the fact discovery deadline to August 1, 2025 (Dkt. 126).
2. The Court also denied Plaintiff's motion for a protective order to bar the deposition of Jodi Garvey, an attorney who represented plaintiff during his state postconviction proceedings (Dkt. 128).
3. Defendants' motion to unseal the grand jury materials in the underlying criminal case in the Circuit Court of Cook County, which Plaintiff did not oppose, was granted. The Circuit Court entered an order granting Defendants' motion on May 8, 2025.

Discovery Disputes

1. Plaintiff's motion to permit the disclosure of CRs from the *In re: Watts Coordinated Proceedings* (Case No. 19-cv-1717) and they are in the process of briefing Defendants' motion to bifurcate Monell discovery (Dkt. 131). Plaintiff's response is due on June 9, 2025.

Oral and Written Discovery

1. The parties have completed the following depositions since the last status report:
 - a. Jamion Winters
 - b. LaTanya Fleming
 - c. Officer Frano
 - d. ASA Dalkin
 - e. Lamarius Robinson
2. The following depositions have been scheduled:
 - a. June 9: Allen Robinson III
 - b. June 11: Alanae Robinson,
 - c. June 17: Shanice Johnson
 - d. June 20: Jodi Garvey
 - e. June 27: Quinton Davis
3. The parties are continuing to confer over scheduling the following depositions:
 - a. Officer Conroy
 - b. Officer Babich
 - c. Officer Brasic
 - d. Officer McDermott

- e. Officer Folino
- f. Officer Celio
- g. Officer Zelig
- h. Oscar Russell
- i. ASA Carter
- j. ASA Meana
- k. Jenee Moreland
- l. Plaintiff

4. Plaintiff has sent to Defendant City of Chicago a Second Set of Interrogatories and to the Individual Defendants a Third Set of Interrogatories. In addition, Plaintiff has issued requests to admit to all Defendants. Defendants' responses are due on June 27, 2025.

Progress of Settlement

5. The parties have not discussed settlement in this case.

Respectfully submitted,

/s/ Fatima Ladha
One of Plaintiff's attorneys
Jon Loevy
Scott Rauscher
Fatima Ladha
Loevy & Loevy
311 North Aberdeen St.
Chicago, IL 60607
312-243-5900
ladha@loevy.com

/s/ Andrea F. Checkai
Special Assistant Corporation Counsel
Steven B. Borkan
Timothy P. Scahill
Misha Itchhaporia
Emily E. Schnidt
Drew Wycoff
Andrea F. Checkai
Borkan & Scahill, Ltd.
20 S. Clark St., Suite 1700
Chicago, IL 60603
(312) 580-1030
*Counsel for Defendants Frano, Celio, Brasic,
McDermott, Folino, Conroy, Zelig & Babich*

/s/ Daniel J. Burns
Special Assistant Corporation Counsel

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Elizabeth A. Ekl
Katherine C. Morrison
Daniel J. Burns
Dhaviella N. Harris
Burns Noland LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
Attorneys for Defendant City of Chicago_

CERTIFICATE OF SERVICE

I, Fatima Ladha, an attorney, hereby certify that I served the foregoing document upon all parties of record by electronic mail on June 6, 2025.

/s/ Fatima Ladha
One of Plaintiff's attorneys